- 61. Wireless service is available from multiple providers throughout Verizon's service areas. Verizon identified the areas served by wireless carriers in each Verizon's top 50 MSAs by examining wireless carriers' coverage maps listed on their websites and then mapped these areas by MSA. These maps are labeled Map C (Attachment O). These maps show that wireless service is widely available from multiple providers throughout the 50 top MSAs where Verizon provides local telephone services as the incumbent.
- 62. Verizon has also prepared maps that show the geographic areas that are served or could be served by VoIP, wireless service or competitive switches. *See*Attachment O, Maps A. The geographic areas that could be served by more than one competitor were color-coded on Maps A to show the number of competitors that are serving or could serve each area in the MSA. For purposes of these maps, the areas that could be served by VoIP are shown as served by only one carrier even though there are many providers from which customers in those areas could purchase VoIP service.
- 63. Wireless service is directly competitive with wireline service. As explained above, Verizon has prepared charts that compare the voice telephone service offerings of several leading competitors, including wireless offerings, for each of Verizon's 50 top MSAs. *See* Exhibit 2. The service packages listed on the charts are those most prominently featured in advertising materials and are most comparable between service providers.
- 64. Wireless carriers were the first to offer rate packages that included local and long-distance calls. Wireline and cable companies then responded to those wireless rate packages. As the attached charts show, wireless service is now fully competitive

with wireline service with respect to price. See Exhibit 2. One Wall Street analyst notes that "[w]ireless pricing dropped below wireline pricing in 2003 for the first time." 87

- 65. The FCC itself and many other analysts have reached the same conclusion. In its 2004 CMRS Competition Report, the Commission found that trends which include "a decrease in the number of residential access lines, a drop in long distance revenues, and a decline in payphone profits" continued, noting an analyst's statement that "wireless cannibalization remains a key driver of access line erosion."
- 66. Wireless prices have declined by as much as 10 to 20 percent a year in recent years. Wireless providers also have increased the number of off-peak minutes they make available on their plan. As a result, many consumers now view wireless long distance service as effectively "free." 90
- 67. In addition to competitive pricing, consumers now report high levels of satisfaction with the quality of their wireless service. For example, a GAO survey found that 83 percent of wireless users were satisfied with the call quality of their cell phone,

<sup>87</sup> V. Grover, Needham, New Year's Resolution – Avoid the Bells at 1 (Dec. 29, 2003).

<sup>88</sup> Ninth CMRS Report ¶ 213 (citing Frank Governali, Goldman Sachs).

<sup>&</sup>lt;sup>89</sup> See, e.g., Ninth CMRS Report, Appendix A at Table 9 (showing average revenue per minute declining every year since 1995 (1998: 21%; 1999: 23%; 2000: 20%; 2001: 30%; 2002: 9%; 2003: 13%)).

<sup>&</sup>lt;sup>90</sup> F. Louthan, Vice President, Equity Research, Raymond James Financial, Inc., prepared witness testimony before the Subcommittee on Telecommunications and the Internet of the House Committee on Energy and Commerce, Washington, DC (Feb. 4, 2004) ("We believe consumers now view wireless long distance as free and are therefore more likely to use their wireless phone to make long distance calls."); V. Shvets, et al., Deutsche Bank, AT&T Corporation: Irrational Exuberance, Rating Downgraded at 2 (Jan. 9, 2004) ("The aggressive bundling by the RBOCs and nationally based wireless pricing has essentially killed consumer long-distance as a stand-alone product. It is no longer a question of whether but rather how quickly consumer long-distance revenue will essentially disappear.").

while only 9 percent were dissatisfied.<sup>91</sup> Analysts similarly report that "[c]ultural awareness and acceptance of wireless as an acceptable/preferred communication medium is growing." Wireless has gained a general level of acceptance among consumers.

# Other Sources of Intermodal Competition.

- 68. E-mail and instant messaging (IM) also now substitute for a large fraction of traffic switched on wireline networks. 93 A large and growing fraction of this traffic originates and/or terminates on competitive networks, but even when carried over the incumbents' network, such traffic displaces significant usage-sensitive (e.g., per-minute or per call) revenues that incumbents otherwise would receive.
- 69. According to various research firms, U.S. users dispatch approximately 9 billion messages per day. 94 If only 5 percent of these substitute for a 90-second voice

<sup>&</sup>lt;sup>91</sup> General Accounting Office, FCC Should Include Call Quality in Its Annual Report on Competition in Mobile Phone Services at 27, Report No. GAO-03-501 (Apr. 2003).

<sup>&</sup>lt;sup>92</sup> S. Ellison, IDC, U.S. Wireless Displacement of Wireline Access Lines Forecast and Analysis, 2003-2007 at Table 1 (Aug. 2003).

<sup>&</sup>lt;sup>93</sup> See D. Schoolar, In-Stat/MDR, State of the US Carrier Market at 6 (Oct. 2003) ("Consumers are using e-mail and instant messaging in place of a phone call."); C. Golvin, et al., Forrester, Sizing U.S. Consumer Telecom, at 19 n.5 (Jan. 2002) ("[a]lternate forms of communications, such as email and instant messaging, []reduce long-distance minutes of use.").

<sup>&</sup>lt;sup>94</sup> See K. Thies, E-mails and Records Management in the Legal Environment, Legal Tech Newsletter (Nov. 14, 2003) ("Almost 9 billion e-mails are sent every day in the United States."); see also B. Silverman, IM Viruses Are Latest Threat to the Networks, New York Post (June 13, 2004) ("Almost 80 million Americans use instant-messaging services at home or work, according to an April 2004 Nielsen/NetRatings survey."); E. Stein, Will IM Pay?, CFO Magazine (May 2004) ("Radicati Group, a technology market research specialist, reckons there are already 60 million business IM accounts. IM could have as many as 182 million business users by 2007, claims Ferris Research.").

call, this data traffic has displaced more than 10 percent of the voice traffic that would otherwise have been handled by the incumbents' networks.<sup>95</sup>

# III. Conclusion

70. Recent technological and market developments demonstrate that competitors are not impaired without unbundled access to local switching. Competitors have significantly deployed their own facilities and are already providing significant and widespread competition for mass market local telephone services without using Verizon's unbundled local switching services. In fact, competitors are providing such competitive services without using circuit switches at all. Accordingly, competing carriers can provide voice service to the mass market and are not impaired without access to incumbent carriers' local circuit switches.

<sup>&</sup>lt;sup>95</sup> Ind. Anal. & Tech. Div., WCB, FCC, *Trends in Telephone Service* at Table 10.1 (Aug. 2003) (Total 2001 Dial Equipment Minutes of 4.8 trillion divided by 2 yields 2.4 trillion conversation minutes; 246 billion/2.4 trillion = 10.3%) (5 percent of 9 billion is 450 million multiplied by 365 days yields 164 billion multiplied by 1.5 (90 seconds) yields 246 billion minutes annually).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October <u>1</u>, 2004

Aichael K. Hassett

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 1, 2004

Vincent J. Woodbury

# DECLARATION OF MICHAEL K. HASSETT AND VINCENT J. WOODBURY

**EXHIBIT 1** 

# Cable Telephony Deployment in Verizon's Service Areas in States in Verizon's Top 50 MSAs

Provider	State	Homes Passed in Counties Served by Verizon*	Cable Telephony Currently Available in Counties Served by Verizon by Numbers of Homes Passed*
Comcast	California	3.1 million	Circuit-Switched (1.2 million in Los Angeles Co., 84,000 in Orange Co.)
	District of Columbia	289,000	
	Delaware	206,000	
	Florida	267,000	
	Illinois	310,000	Circuit-Switched (260,000 in Chicago MSA)
	Indiana	649,000	
	Massachusetts	2.2 million	Circuit-Switched (1.6M in Boston MSA)
	Maryland	1.8 million	
	New Hampshire	n/a	Circuit-Switched
	New Jersey	1.6 million	
	Oregon	730,000	Circuit-Switched (648,000 in Portland MSA)
	Pennsylvania	2.4 million	Circuit-Switched (730,000 in Pittsburgh MSA)
	Texas	660,000	Circuit-Switched (660,000 in Dallas MSA)
	Virginia	523,000	Circuit-Switched (170,000 in Richmond MSA, 348,000 in Northern VA)
	Washington	1.2 million	Circuit-Switched (689,000 in Seattle MSA)
	West Virginia	58,000	
	Wisconsin	18,000	
Time Warner	California	771,000	VoIP (579,000 in Los Angeles MSA)
	Florida	56,000	
	Indiana	45,000	
	Maine	157,000	VoIP (145,000 in Portland MSA)
	Massachusetts	34,000	
	New Hampshire	22,000	
	New Jersey	77,000	VoIP (77,000 in Bergen and Hudson counties)
	New York	3.5 million	VoIP (367,000 in Albany MSA, 89,000 in Binghamton MSA, 40,000 in Ithaca MSA, 2.0 million in New York MSA, 82,000 in Rochester MSA, 257,000 in Syracuse MSA)
	North Carolina	169,000	VoIP (55,000 in Charlotte MSA, 104,000 in Durham MSA)
	Pennsylvania	236,000	

Provider	State	Homes Passed in Counties Served by Verizon*	Cable Telephony Currently Available in Counties Served by Verizon by Numbers of Homes Passed*
	Texas	2.6 million	VoIP (134,000 in Austin MSA, 1.5 million in Houston MSA, 565,000 in San Antonio MSA)
	West Virginia	34,000	
	Wisconsin	153,000	VoIP (40,000 in Milwaukee MSA)
Cablevision	Connecticut	232,000 (Fairfield Co.)	VoIP (232,000 in Fairfield Co.)
	New Jersey	1.2 million	VoIP (1.2 million statewide)
	New York	2.4 million	VoIP (2.4 million statewide)
Charter	California	1.2 million	
	Delaware	9,200	
	Illinois	142,000	
	Indiana	48,000	
	Maryland	55,000	
	Massachusetts	284,000	
	New Hampshire	6,900	
	New York	37,000	
	North Carolina	95,000	
	Oregon	111,000	
	Texas	560,000	
	Vermont	25,000	
	Virginia	109,000	
	Washington	143,000	
	West Virginia	279,000	
	Wisconsin	571,000	VoIP (38,000 in Wausau MSA, 167,000 in Dane Co.)
Cox	California	537,000	Circuit-Switched (306,000 in Orange Co.)
	Massachusetts	1,300	
	North Carolina	800	
	Rhode Island	356,000	Circuit-Switched (356,000 statewide)
	Texas	317,000	
	Virginia	1.1 million	VoIP (77,000 in Roanoke MSA) Circuit-Switched (377,000 in Northern VA 621,000 in Virginia Beach MSA)
	Total for 5 MSOs	more than 33 million	more than 18 million

Provider	State	Homes Passed	Cable Telephony Currently Available
		in Counties Served by Verizon*	in Counties Served by Verlzon by
		<u> </u>	Numbers of Homes Passed*

<sup>\*</sup>Homes passed in counties served by Verizon. Data for MSAs where cable telephony is available also reflect only counties served by Verizon.

Sources: Media Business Corp., Top 10 MSOs by County (Mar. 2004) (homes passed). Comcast. Media Business Corp., Top 10 MSOs by County (Mar. 2004) (states); Kagan, Future of Cable Telephony at 13 (Oct. 2003) (telephony availability) ("Kagan Future of Cable Telephony"); Comcast State Tariffs, available at http://www.comcast.com/Products/Telephony/Policies.ashx?LinkID=63 (telephony availability); CED in Depth, Advanced Services Deployment Handbook at 14 (Mar. 2004) (telephony availability). Time Warner. Time Warner Cable, About Us, http://www.timewarnercable.com/corporate/aboutus/?menu=Aboutus (states); Time Warner Cable News Release, Time Warner Cable Launches Phone Service in Charlotte (June 4, 2004) (telephony availability); Time Warner Cable Raleigh-Durham-Fayetteville, Digital Phone: New Residential Phone Service, http://www.twcnc.com/digital\_phone/index.cfm (telephony availability); Time Warner Cable, Time Warner Cable Albany Plan Details, http://www.twcdigitalphone.com/albany/friendlies/plandetails.htm (telephony availability); Time Warner Cable, Time Warner Cable Rochester NEW Residential Phone Service, http://www.twcdigitalphone.com/rochester/ (telephony availability); Time Warner Cable, Digital Phone: Time Warner Cable NEW Residential Phone Service, http://twcny.com/digitalPhone/index.cfm?ThankYou=One (telephony availability); Time Warner Cable, Time Warner Cable of New York and New Jersey Plan Details, http://www.twcdigitalphone.com/newyork/plandetails.htm (telephony availability); Time Warner Cable, Digital Phone, http://www.digitalphonela.com/ (telephony availability); Time Warner Cable, Time Warner Cable Binghamton NEW Residential Phone Service, http://www.twcdigitalphone.com/binghamton/index.htm (telephony availability); Time Warner Cable, Plan Details, http://twcny.com/digitalPhone/planDetails.cfm (telephony availability); Time Warner Cable, Time Warner Cable Houston NEW Residential Phone Service, http://www.twcdigitalphone.com/houston/index.htm (telephony availability); Time Warner Cable, Time Warner Cable San Antonio NEW Residential Phone Service, http://www.twcdigitalphone.com/sa/index.htm (telephony availability); Time Warner Cable of Southeastern Wisconsin, Digital Phone, http://www.timewarnercable.com/milwaukee/products/digitalphones/ default.html?menu=Products&Services (telephony availability). Cablevision. Cablevision Systems, Corporate: Cable and Communication, http://www.cablevision.com/index.jhtml?pageType=cable comm. (states). Charter. Charter Communications, Our Markets, http://www.charter.com/aboutus/ourstory/markets.asp (states); CED inDepth, Advanced Services Deployment Handbook at 14 (Mar. 2004) (telephony availability); J. Newman, A Long Way From the Rotary Phone; Voice Over Internet Protocol is Hottest New Way to Talk, Wisconsin State J. (Sept. 5, 2004) (telephony availability). Cox. Cox Communications, Cox Communications, http://www.cox.com; Cox Communications, Form 10-K (SEC Filed Feb. 27, 2004) (states); Kagan Future of Cable Telephony (telephony availability).

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# DECLARATION OF MICHAEL K. HASSETT AND VINCENT J. WOODBURY

**EXHIBIT 2** 

# Competitive Prices for Mass Market Voice Telephone Service

There are many competitors offering mass market voice telephone service in Verizon's top 50 MSAs without using unbundled local switching and their offerings are priced at levels that are comparable to or below Verizon's voice telephone package rate. For each of these MSAs, Verizon has prepared a table that compares the prices and features of the voice telephone service offerings of several leading competitors, including VoIP offerings, wireless offerings and circuit switched offerings. Verizon prepared these tables by examining the competitors' websites and other publicly available information. These comparisons show that mass market customers can obtain voice telephone service from several competitors at rates that are comparable to or lower then Verizon's rates.

**NEW YORK** 

1		Circuit-S	witched					VolP <sup>1</sup>					Wire	eless	
	Verizon Freedoar	RCN Mogaphone	AT&T One Pate USA	MCI Neiglibor hodd Complete	Cablevision Optimiles Voice	Time Warner Cubtr Digital Phone	Vonage Promise Unlimited	AT&T Ca- Vantäge	VoicePulse America Unimited	Packet8 Freedom Unlimited	Uingo Greenited	Verizon Wireless Americals Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get Morr (Natronal)
Price	\$59.95	\$60.00	\$54.95	\$49.99	\$34.95 <sup>2</sup>	\$39.95 <sup>3</sup>	£24.00	\$29.99	\$34.99	\$19.95	\$19.95	800 mues	600 mms	600 mins	600 mins
Local		V 0 0			354.83	<b>3</b> 29.93		323.53	304,73	<b>419.33</b>	\$13.33		## 1000 000 000 000 000 000 000 000 000	n Plan Minut	<b>\$</b> 39.99
Calling						Unlimited								hts and weel	
Local Toll Calling						Unlimited								n Plan Minut hts and weel	
Long Distance						Unlimited								n Plan Minut hts and weel	
Calling Features	5	4	4	5	7	3	13	11	16	6	12	5	5	4	5
Relies on UNE-P		No	Y	es						No					

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

<sup>&</sup>lt;sup>2</sup>Cablevision also offers this package bundled with high-speed Internet and digital cable service for \$89.85 a month. Customers "are essentially receiving their voice service for free," according to Cablevision.

<sup>3</sup>Reflects the \$10 discount for customers subscribing to both Digital Cable and High-Speed Internet service.

# **WASHINGTON, DC**

# Comparison of Competitive Calling Bundle Prices and Features

			C	ircuit-Switche	d					VolP1			I	Wir	eless	
	Verizon Finedom	StarPower (/it/a Unlimited	Cox Union fed Connections	Comcast Connections Any Distance	AT&T One Rate USA	MCI Vergfdio: nood	Cavalier Unlimited	Vonage Premium Unimited	AT&T 0.///Vantage	Phonom	Packet8 Freedom Voumited	Lingo Hulum.ted	Verizon Wireless America's	Cingular Nation	AT&T Wireless National	T-Mobile Get More Nationali
		Long Distance	(Fairfax)			Complete							Choice			
_													800 mirs	600 mins	600 mins	600 mins
Price	\$49.95	\$51.80	<b>\$</b> 49.95	\$48.95	\$49.95	\$49.99	\$44.95	\$24.99	\$29.99	\$34,99	\$19.95	<b>\$</b> 19.95	\$59.99	\$49.99	\$49,99	\$39.99
Local Calling						Unlim	nited								in Plan Minus ghts and wee	
Local Toll Calling						Unlim	nited								In Plan Minut	
Long Distance						Unlim	nited								in Plan Minut thts and wee	
Calling Features	5	4	11	3	4	5	8	13	11	10	6	12	5	5	4	5
Relies on UNE-P			No		Y	es					N	lo				

<sup>1</sup>Requires broadband connection at additional cost.

# **PHILADELPHIA**

		Cir	rcuit-Switch	ed				Vo	olP <sup>1</sup>				Wire	less	
	Verizon	RCN	AT&T	MCI	Cavalier	Vonage	AT&T	Phonom	VoicePulse	Packet8	Lingo	Verizon	Cingular	AT&T	T-Mobile
	Freedom	Megaphani		Neighbor	timin ded	Preman	CadVantage		America	Freedom	Unlimited	Wireless	Nation	Wiretess	Get More
			USA	hood Coinpiete		Unlimited			Unlimited	Unamited		America's Choice		(National)	(National)
				Complete								0.4001			
															ore eyes
															0.000 0.000 0.000
Price	\$54.95	\$55.00	\$49.95		\$44.95				\$34.99						\$39.9 <b>9</b>
Local				1-11		Unlimited		.,				ln	cluded withi	n Plan Minut	es
Calling						Offinitied						(plus u	nlimited nig	hts and wee	kends)
Local Toll						Unlimited								n Plan Minut	
Calling						Olimilitea						(pius u	inlimited nig	hts and wee	kends)
Long						Unlimited						Inc	cluded withi	n Plan Minut	es
Distance						Ommined						(plus u	inlimited nig	hts and wee	kends)
Calling	5	}	4	5	8	13	11	10	16	6	12	5	5	4	5
Features		1 7	•			.,,		,,,	.,,		'-		J	<b>.</b>	
Relies on	,	No	٧	es						No					
UNE-P	1		,												

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

**BOSTON** 

			Circuit-Switche	od .				Vo	IP <sup>1</sup>				Wire	less	
	Verizon Freedom	RCN Megaphona	Comeast Connections Any Distince	AT&T One Rate USA	MCI Neighbor hood Complete	Venage Premium Uni mitert	AT&T CallVantage	VoicePulse America Uniomited	Packet8 Erredom Unlimited	Lingo Undinated	BroadVoice Union ted U.S.A	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
												B(H) m ns	fight opery	Egg or over	500 mins
Price	\$54.95	\$55.00	<b>\$48.95</b>	\$49.95	\$55.99	524.99	\$29.99	\$34.99	\$19.95	<b>\$</b> 19.95	\$19.95	\$59.99	\$49,99	\$49.99	\$39.99
Local Calling		<u> </u>			<u> </u>	Unlimited						•••	cluded withi Inlimited nig	· · · · · · · · · · · · · · · · · · ·	
Local Toll Calling						Unlimited							cluded withi Inlimited nig		
Long Distance					<u>.</u>	Unlimited							cluded withi Inlimited nig		
Calling Features	5	4	4	4	5	13	11	16	6	12	16	5	5	4	5
Relies on UNE-P		No		Y	es					٨	lo				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

**LOS ANGELES** 

1		Circuit-Sv	witched					VolP <sup>1</sup>				Wire	eless	
Ì	Verizon	Comcast	ТВТД	MCI	Time Warner	Vonage	AT&T	VoicePulse	Packet8	Lingo	Verizon	Cingular	AT&T	T-Mobile
	Freedon	Connections Any Distance	Serie Rate HSA	No ghlior- ngon Complete	Cable Digital Phone	Principal Selented	SairVantage	America Unhevited	Freedoin Unimited	Un!meted	Wireless Anichan's Choice	Nation	Wireless (National)	Get More (National)
											500 mins	600 mins	600 mins	600 mins
Price	\$59.95	<b>\$</b> 48.95	\$54.95	\$49.99	\$39.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$49.99	\$49.99	\$49.99	\$39.99
Local Calling					Unlim	ited						-	in Plan Minu hts and wee	
Local Toll Calling					Unlim	ited							n Plan Minu hts and wee	
Long Distance					Unlin	ited							n Plan Minu hts and wee	
Calling Features	5	4	4	5	2	13	11	16	6	12	5	5	4	5
Relies on UNE-P		No	Y	es					N	0				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost. <sup>2</sup>Reflects the \$10 discount for customers subscribing to both Digital Cable and High-Speed Internet service.

**BALTIMORE** 

[	Ci	rcuit-Switch	ed			VolP <sup>1</sup>			Ĭ	Wire	eless	
	Verizon Erredom	AT&T One Rate USA	MCI Neiabbor Augd Complete	Vonage Premum Unlimited	AT&T CimVantage	VoicePulse	Packet8 Freedom Unlimited	Lingo the mited	Verizon Wirtiess America's Choice	Cingular Nation	AT&T Wirdess (National)	T-Mobile Get Merc (National)
									გენ თ. იგ	era mon		
Price	\$49.95	\$49.95	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling			-	Unli	mited		_		1	• • • • • • • • • • • • • • • • • • • •	in Plan Minus hts and wee	
ocal Toll Calling				Unli	mited						in Plan Minus hts and wee	
Long Distance		•		Unli	mited						in Plan Minus ohts and wee	
Calling Features	5	4	5	13	11	16	6	12	5	5	4	5
Relies on UNE-P	No	Y	es					No				

<sup>1</sup>Requires broadband connection at additional cost.

TAMPA

Comparison of Competitive Calling Bundle Prices and Features

ſ	Circuit-	Switched				VoiP <sup>1</sup>					Wire	less	
	Verizan Freedom	Z-Tel Z-Linc HOME Ualim-ted	Bright House Networks Digital	Vonage Premium Unlimited	AT&T CallVantage	VoicePulse America Onfimited	Packet8 Freedom Un! mited	Lingo Unlimited	BroadVoice Unimited U.S.A	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
X			Phone:									non milita	egn wins
Price	\$49.95	\$64.99	\$39.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$19.95	\$49.99	\$54.99	\$49.99	\$39.99
Local Calling					Unlimited							n Plan Minut hts and wee	- · <del>-</del>
Local Toil Calling					Unlimited							n Plan Minut hts and wee	
Long Distance					Unlimited					***		n Plan Minut hts and wee	
Calling Features	5	8	3	13	11	16	6	12	16	5	5	4	5
Relies on UNE-P	No	Yes						No					

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost. <sup>2</sup>Reflects the \$10 discount for customers subscribing to both Standard Cable and High-Speed Internet service.

**RIVERSIDE** 

		Circuit-	Switched			Vo	IP <sup>1</sup>			Wir	eless		
	Verizon Freedone	AT&T One Rate USA	MCI Ne gaber- nood Complete	Z-Tel Z-Line HOME Valimited	Vonage Fremuer Ordinisted	AT&T CallVantage	VoicePulse America Unimided	Packet8 Freedom Unimmted	Verizon Wireless America's Choice	Cingular Nat-oc	AT&T Wireless (National)	T-Mobile Get More (National)	
									500 0000	PPD mire	600 mm.		
Price	\$59.95	\$49.95		\$49.99	\$24.99	\$29.99	\$34.99	\$19.95	\$49.99	\$49.99	\$49.99	\$39.99	
Local Calling				Unili	mited						in Plan Minut ghts and wee		
Local Toll Calling	Unlimited Included within Plan Minutes (plus unlimited nights and weekends)												
Long Distance		111		Unli	mited				]		in Plan Minut ghts and wee		
Calling Features	5	4	5	8	13	11	16	6	5	5	4	5	
Relies on UNE-P	No		Yes					N	lo				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

# PITTSBURGH

۱		<del></del> 5	Circuit-Switched	Ę.				VolP'				Wireless	888	
	Verizon Freedom	Compast AT&T Connections On Pate Any Distance SSA	AT&T Ord Pate USA	MCI Mergebor Soorf Complete	Z-Tei Z-Line rOME Unismited	Vonage Pometen Milanted	Vonage AT&T VoicePulso Pomagos CartVantidor America Usianited Cellmited	VoicePulse America Celested	Packet8 Freedom Unimited	Lingo Uni mited	Verizon L Wereless America « Choice	Verizon Leap-Cricket AT&T Areress Unimited Workings Predicers Chorce	AT&T Webess Netrorize	T-Mobile Get More (National)
											500 mins		su-ta 009	690 mins
Price	\$54.95	\$49.95	\$49.95	\$49.99	\$49.99 \$24.99	\$24.99	\$29.99	\$34.99 \$19.95	\$19.95	\$19.95	\$49.99	\$49.99 \$48.99	\$49.99 \$39.99	\$39.99
Local					Unlimited	ited					oul n snid)	Included within Plan Minutes (plus unlimited nights and weekends)	Pian Minut	es kends)
Local Toll Calling					Unlimited	ifed					oul n sold)	Included within Plan Minutes (plus unlimited nights and weekends)	Plan Minut Its and wee	es kends)
Long					Unlimited	lited					n snld)	Included within Plan Minutes (plus untimited nights and weekends)	Plan Minut Its and wee	es kends)
Calling Features	2	4	4	un .	8	13	11	16	9	12	2	ဗ	4	rc.
Relies on UNE-P		No		Yes						8				

'Requires broadband connection at additional cost.

# **PROVIDENCE**

1		Circuit-S	witched				VolP <sup>1</sup>				Wire	eless	
	Verizon Freedom	Cox Gramated Connection	AT&T One Rate USA	MCI Neigsbor breed Complete	Vonage Premium Unimited	AT&T CallVantaq-	VoicePulse America Bolimited	Packet8 Freedom Unlimited	Lingo Untimited	Verizon Wireless Americas Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
										800 m·ns	600 mars	600 mass	600 mms
Price	\$54.95	\$39.95	\$54.95	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99
Local Calling					Unlimited							n Plan Minu hts and wee	
Local Toll Calling					Unlimited							n Plan Minu hts and wee	
Long Distance					Unlimited							n Plan Minu hts and wee	
Calling Features	5	9	4	5	13	11	16	6	12	5	5	4	5
Relies on UNE-P		No	Y	es					No				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost. <sup>2</sup>Reflects the \$10 discount for customers subscribing to both Digital Cable and High-Speed Internet service.

# **VIRGINIA BEACH**

		Ci	rcuit-Switch	ed				VolP <sup>1</sup>				Wire	less	
	Verizon	Cox	AT&T	MCI	Cavalier	Vonage	AT&T	Phonom	Packet8	Lingo	Verizon	ALLTEL	SunCom	T-Mobile
	Freedom	Connection Unlimited (Hampton Roads)	Orie Rate USA	Neighbor- hood Complete	tantimated	Promises Unumrted	CallVantage		Freedom Unlimited	Unlimited	Wireless Amelica's Choice	National Freedom	tinPlan	Get More (National)
											800 mins	600 mips		600 mins
Price	\$49.95	<b>\$4</b> 9.95	\$49,95	\$49.99	\$44.95	\$24.99	\$29,99	\$34.99	\$19,95	\$19,95	\$59.99	\$45,00	\$50.00	\$39,99
Local Calling					Unlin	nited							n Plan Minut hts and wee	
Local Toff Calling	Unlimited Included within Plan Minutes (plus unlimited nights and weekends)													
Long Distance					Unli	nited							n Plan Minut hts and wee	
Calling Features	5	6	4	5	8	13	11	10	6	12	5	5	5	5
Relies on UNE-P		No	Y	es					٨	lo				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

**RICHMOND** 

		Cir	cuit-Switch	ed				VolP <sup>1</sup>				Wire	eless	
	Verizon Freedom	Comcast Connections Any Distance	AT&T One Rate USA	MCI Neighbor- hood Complete	Cavalier Un outed	Vonage Promyon Untimited	AT&T CallVantagr	Phonom	Packet8 Freedom Unlimited	Lingo Unl-mited	Verizon Wireless America's Choice	ALLTEL National Freedom	SunCom UnPlan	T-Mobile Get More (National)
											gáll mins	600 mins		600 mins
Price	\$49.95	\$49.95	\$49.95	\$49.99	\$44.95	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$45.00	\$50.00	\$39.99
Local Calling					Unlin	nited						cluded withi Inlimited nig		
Local Toll Calling	Unlimited Included within Plan Minutes (plus unlimited nights and weekends)													
Long Distance					Unlin	nited						cluded withi Inlimited nig		
Calling Features	5	3	4	5	8	13	11	10	6	12	5	5	5	5
Relies on UNE-P		No	Y	'es					N	lo				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

# DALLAS

_	Circuit	Circuit-Switched			VolP	_				Wire	Wireless	
	Verizon Freedom	Comcast Connections Any Distance	Vonage Premium Unimated	A18T VoicePurse CarVantagy America Ustanted	VoicePurse America Ustranted	Packet8 Frondom Untented	Lingo Ustimited	Lingo BroadVoice Unaimited Unamited U.S.A.	Verizon Wireiess America's Choice	Cingular Nation	AT&T Wireless Nationall	T-Mobile Get More (Nationals
									500 mins	600 mins	800 mms	\$00 mins
82	\$54.95	\$49.99	\$24.99	\$29.99	\$34.99 \$19.95 \$19.95 \$19.95	\$19.95	\$19.95	\$19.95	\$49.90	\$49.99	\$49.99 \$49.99 \$49.99 \$39.9 <del>9</del>	£39.94
Calling		50 - 100 May 1 - 1		Unlimited	ited				n snid) Ni	luded within nlimited nig	Included within Plan Minutes (plus unlimited nights and weekends)	se cends)
ocal Toll Calling				Unlimited	ited				n snid)	luded within	Included within Plan Minutes (plus unlimited nights and weekends)	ss cends)
ong.				Uniimited	ited				n snld)	studed within	Included within Plan Minutes (plus unlimited nights and weekends)	es (ends)
Salin	r.	4	13	7	16	9	12	16	5	5	4	2
e o						No	_					

'Requires broadband connection at additional cost.

# BUFFALO

		Circuit	Circuit-Switched				VolP	_				Wireless	ess	
	Verizon	AT&T One Rate	MCI	Z-Tel	Vonage	Vonage AT&T VoicePulse Premium CarlVartage America	VoicePulse Packet8 America Freedom	Packet8 Freedom	Lingo	Lingo BroadVoice Unimited Unimited	Verizon	Cingular Nation	AT&T Wireless	T-Mobile Get More
-		USA	rood Complete	HOME Unimited	Jennaded		patialisaj	(heliquifod		U S D	Americals Choice		Nationall	Nationali
											500 mass	გიის ისე	siljat ööğ	600 mins
Price	\$59.95	\$54.95	\$49.50	\$49.99	\$24.99	\$29.89	\$29.99 \$34.99 \$19.95 \$19.95	\$19.95	\$19.95	\$19.95 \$49.99 \$49.99	56 675	\$49.99	\$49.99	\$39.5
Local					Callir	Unlimited					n snid)	Included within Plan Minutes (plus unlimited nights and weekends)	n Plan Minut hts and wee	es kends)
Local Toll Calling					Gallir	Unlimited					n snid)	Included within Plan Minutes (plus unlimited nights and weekends)	ו Plan Minut hts and wee	es kends)
Long istance					Cullin	Unlimited					oul n sold)	Included within Plan Minutes (plus unlimited nights and weekends)	n Plan Minut hts and wee	es kends)
Calling eatures	s	4	ĸ	80	13	11	16	9	12	16	5	5	4	S
no a	Ŷ		Yes						Z	N <sub>o</sub>				

'Requires broadband connection at additional cost.

SEATTLE

Comparison of Competitive Calling Bundle Prices and Features

ſ		ircuit-Switche	d			Vo	JP <sup>1</sup>				Wire	less	
	Verizon Freedom	Compast Connections Any Distance	MCI Neighbor- nood	Vonage Premium Unlimited	AT&T CallVinitage	voiceglo Unemited	VoicePulse Amorica Unlimited	Packet8 Freedom Unbmited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wireless (National)	T-Mobile Get More (National)
			Complete							500 mins	600 mins	600 mins	600 mins
Price	\$64.95	\$49.99	\$55.99	\$24.99	\$29.99	\$29.99	\$34.99	\$19.95	\$19.95	\$49.99	\$49.99	\$49,99	\$39.99
Local Calling		and the state of t	200	***************************************	Unlimited						cluded withi inlimited nig		
Local Toll Calling					Unlimited						cluded withi inlimited nig		
Long Distance					Unlimited						cluded withi Inlimited nig		
Calling Features	5	4	5	13	11	6	16	6	12	5	5	4	5
Relies on UNE-P		No	Yes					N	lo				

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.

# WORCESTER

		Circuit-	Switched				VolP <sup>1</sup>				Wire	eless		
	Verizon Freedom	AT&T One Ratin USA	MCI Neighbor- hood Complete	Z-Tel Z-Line HOME Unlimited	Vonage Promium Unlimited	AT&T CallVantage	VoicePulse America Unlimited	Packet8 Finedom Unlimited	Lingo Unlimited	Verizon Wireless America's Choice	Cingular Nation	AT&T Wiraless (National)	T-Mobile Set More (National)	
	:													
Price	\$54.95	\$49.95	\$55.99	\$55.99	\$24.99	\$29.99	\$34.99	\$19.95	\$19.95	\$59.99	\$49.99	\$49.99	\$39.99	
Local Calling					Unlimited							n Plan Minut hts and wee		
Local Toll Calling					Unlimited							n Plan Minut hts and wee		
Long Distance		_		· · · · · ·	Unlimited					Included within Plan Minutes (plus unlimited nights and weekends)				
Calling Features	5	4	5	8	13	11	16	6	12	5	5	4	5	
Relies on UNE-P	No		Yes						No					

<sup>&</sup>lt;sup>1</sup>Requires broadband connection at additional cost.